

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal No. 1:18-cr-00083-TSE

Judge T. S. Ellis, III

**DEFENDANT PAUL J. MANAFORT, JR.'S MOTION TO TEMPORARILY MODIFY
CONDITIONS OF RELEASE TO ATTEND BAPTISM AND RELATED RECEPTION**

Paul J. Manafort, Jr., by and through counsel, hereby moves the Court to temporarily modify his current conditions of release to permit him to be with his family for his grandson's baptism ceremony on May 19, 2018 and a reception celebrating that event later the same day. Counsel for Mr. Manafort have conferred with the Office of the Special Counsel (the "Special Counsel") and the Special Counsel has no objection to this request. The baptism of his grandson is of course an important religious and family event (Mr. Manafort is also an honorary godparent of his grandson). Therefore, Mr. Manafort requests that the Court permit him to travel by car on May 19, 2018 at 9:00 a.m. from his residence in Arlington, Virginia directly to the Catholic Church, located in Arlington, Virginia, where the baptism ceremony is scheduled to commence at 10:00 a.m., and, thereafter, directly to a family reception to be held at a private residence located in Arlington, Virginia. Following the reception, Mr. Manafort will immediately return directly to his residence, not later than 5:00 p.m. Specific addresses for the church and reception have been provided to Pretrial Services.

WHEREFORE, Mr. Manafort respectfully moves this Court to temporarily modify his current conditions of release on May 19, 2018, from 9:00 a.m. to 5:00 p.m., as outlined above.

Dated: May 11, 2018

Respectfully submitted,

s/ Kevin M. Downing
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